



U.S. Department of Justice

*United States Attorney
Southern District of New York*

*The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007*

November 26, 2019

BY ECF

The Honorable P. Kevin Castel
United States District Judge
Daniel Patrick Moynihan Federal Courthouse
500 Pearl Street
New York, NY 10007-1312

**Re: United States v. Jason Galanis,
15 Cr. 643 (PKC)**

Dear Judge Castel:

The Government writes with consent of counsel for the defendant to request an approximately 30-day adjournment of the status conference presently scheduled for December 2, 2019 in the above-captioned matter (the "Gerova Matter"). As the Court is aware, Your Honor granted, on consent of the parties, the defendant's Rule 33 motion in the Gerova Matter on October 7, 2019 and vacated the defendant's conviction in the Gerova Matter. A companion matter, under docket number 16 Cr. 371 (PKC) (the "Wakpmani Matter"), was remanded to this Court by the United States Court of Appeals for the Second Circuit on October 28, 2019. Counsel for the defendant filed a consented-to motion to vacate the defendant's conviction in the Wakpamni Matter pursuant to Rule 33 on November 15, 2019. That motion remains *sub judice*.

The Government requests the adjournment in order to provide the Court sufficient time to consider and resolve the pending motion. Once the motion is resolved, the Government anticipates making a joint plea offer that will resolve both the Gerova Matter and the Wakpamni Matter as to the defendant.

The Government further request an exclusion of time pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), to allow the parties further time to negotiate and finalize a potential pretrial disposition of this matter. Counsel for the defendant consents to the requested exclusion.

Respectfully submitted,

GEOFFREY S. BERMAN
United States Attorney

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cc: Christopher Madiou, Esq. and Daniel Nooter, Esq. (by ECF)